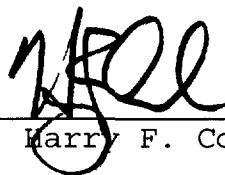


Statement of Harry F. Cole, Esq.

As an officer of this Court, I represent that statements attributed to me in paragraphs 11, 19(d), 19(f), 20, 21 and 34 of the foregoing MOTION TO ENLARGE ISSUES (FALSE STATEMENTS AND MISREPRESENTATIONS BY MICHEAL PARKER IN BANKRUPTCY PROCEEDINGS) are true and correct to my best knowledge and belief.

A handwritten signature in black ink, appearing to read "H. Cole", is written over a horizontal line.

Harry F. Cole

Washington, D.C.
October 18, 1999

EXHIBIT 4

REC/MELLON MAR 31 1994

04-04-94 8180888 023

FCC 323

OWNERSHIP REPORT

SECTION I - FEE INFORMATION (For Annual Ownership Report Filers Only)

1. LICENSEE NAME Reading Broadcasting, Inc.													
MAILING ADDRESS (Line 1) (Maximum 35 characters) 1729 N. 11th Street													
MAILING ADDRESS (Line 2) (if required) (Maximum 35 characters)													
CITY Reading		STATE OR COUNTRY (if foreign address) PA	ZIP CODE 19604										
TELEPHONE NUMBER (include area code) 610-921-9181		CALL LETTERS WTVE											
FOR MAILING THIS REPORT, SEE GENERAL INSTRUCTION 2.													
2. A. Is a fee submitted with this application?			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No										
B. If No, explain: _____; and go to Section II.													
C. If Yes, provide the following information:													
Enter in Column (A) the correct Fee Type Code for the services covered by this report. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Enter in Column (B) the Fee Multiple, if applicable. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number listed in Column (B).													
(1)	(A) FEE TYPE CODE <table border="1" style="width:100%"><tr><td>M</td><td>A</td><td>T</td></tr></table>	M	A	T	(B) FEE MULTIPLE (if required) <table border="1" style="width:100%"><tr><td></td><td></td><td></td><td>i</td></tr></table>				i	(C) FEE DUE FOR FEE TYPE CODE IN COLUMN (A) <table border="1" style="width:100%"><tr><td>\$ 35.00</td></tr></table>	\$ 35.00	FOR FCC USE ONLY <table border="1" style="width:100%"><tr><td></td></tr></table>	
M	A	T											
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\$													
ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (2), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE. →				TOTAL AMOUNT REMITTED WITH THIS APPLICATION <table border="1" style="width:100%"><tr><td>\$ 35.00</td></tr></table>	\$ 35.00	FOR FCC USE ONLY <table border="1" style="width:100%"><tr><td>35.00</td></tr></table>	35.00						
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SECTION II - OWNERSHIP INFORMATION (for all filers)

1. All of the information furnished in this Report is accurate as of March 29, 19 94
(Date must comply with Section 73.3615(a), i.e., information must be current within 60 days of the filing of this report, when 1(a) below is checked.)

This report is filed pursuant to Instruction (check one)

1(a) ☒ Annual

1(b) ☐ Transfer of Control or
Assignment of License

1(c) ☐ Other

for the following stations:

Call Letters	Location	Class of service
WTVE	Reading, PA	TV

Reading Broadcasting, Inc.
FCC Form 323

EXHIBIT 2

Micheal L. Parker is the sole shareholder, officer and director of Partel, Inc. Mr. Parker's media interests are set forth in Exhibit 1.

EXHIBIT 5

1 and a Cadillac dealership. It was a great
2 investment. I got to drive a free Cadillac
3 and got my money back at the end.

4 But apart from that, I don't really
5 recall any directorships. That doesn't mean,
6 again, they didn't exist then.

7 Q All right. When I was reading the
8 few transcripts I saw where for a period of
9 time you did business as Micheal Parker and
10 Associates or some such name, and then there
11 came a time where you often did business as
12 Partel, Inc; is that correct?

13 A That's correct.

14 Q You are the sole owner of Partel,
15 Inc?

16 A That is correct -- excuse me, I
17 said it's correct. But I live in a community
18 property State, so I would assume that my
19 wife owns half.

20 Q Partel, Inc, performed some of the
21 consulting services that were referred to in
22 the transcript that we had, Exhibit 3?

1 A I'd have to know the date of this
2 examination.

3 Q I don't mean to take up time on
4 that. Approximately when did Partel, Inc,
5 come in to being and was a vehicle by which
6 you performed some sort of services one way
7 or another?

8 A I'm sorry, I don't, I'm sitting
9 here trying to come up with a date and I
10 don't really recall. If it's all right, I'll
11 get you that answer after lunch, because I
12 can go back and ask my staff what day it was
13 incorporated.

14 Q That would be, that would be fine.

15 A I'd rather do that and get you an
16 accurate answer.

17 Q That's fine. All right, let's talk
18 about Reading Broadcasting, Inc. Describe
19 the circumstances under which you became
20 involved in this veil of tears.

21 A I was in the bathtub, taking a
22 bath, and I got a phone call from a broker

1 in order to get the plan approved, if it were
2 objected to by anybody, it probably would
3 have fallen apart.

4 So, he worked with me with a lot of
5 creditors to convince them that this plan was
6 the way to go. That's why it took so long to
7 get from its first filing to its final
8 approval.

9 Q Were you instrumental in Mr. Mercer
10 becoming the secretary of the corporation?

11 A Very much so, and I and several
12 other directors actually thought that, at
13 that point in time, in order to get us from
14 the paper transaction through the final on
15 the air transaction, that it was a good, it
16 was good to have Mr. Mercer there.

17 Q Ms. Hendrickson is vice president,
18 who is she?

19 A She was an employee of Partel and
20 was my chief assistant for a number of years
21 and when she came to Reading, her primary job
22 was troubleshooter, talk to the staff, find

1 out if things were falling through the
2 cracks, what needed to be done to make sure
3 that we were covering all our bases and it
4 was very useful for her to be a vice
5 president. The Board, I recommended her for
6 vice president, the Board agreed to that.

7 Q How long had she been with, what's
8 the name of your company?

9 A What, Partel?

10 Q Yes, how long has she been with
11 Partel?

12 A From the first day.

13 Q I gather from this address that she
14 did not move here or did she move here?

15 A No, she did not move here.

16 MR. HUTTON: By here, you mean
17 where?

18 MR. BECHTEL: 2000 L Street.

19 MR. HUTTON: K Street.

20 BY MR. BECHTEL:

21 Q She did not move to Reading?

22 A No, she did not move to Reading,

1 okay.

2 Q Did Partel, during the period,
3 during the license period, have other matters
4 going on or was it, or was the work of the
5 Reading project basically the company's
6 business?

7 A No, it had other projects going on
8 during that period. I would, you know, it
9 was probably its primary business.

10 Q No, I understand.

11 A But it did have other projects.

12 Q Yes, it had been an operational
13 thing. I think it dates back to the mid-80s
14 or before the mid-80s.

15 A No, I think it's early '80s, I just
16 couldn't give you the exact date.

17 Q Yes, exactly.

18 A I want to say sometime around 1981,
19 sometime during that time period.

20 Q Good. You indicated that Judge
21 Rose and you on the plane talked about your
22 tower situation?

EXHIBIT 6

1 MR. HUTTON: Okay.

2 MR. BECHTEL: You're the one that's
3 been rattling those minutes all the time. I
4 said, you're the one that's been rattling the
5 minutes all the time.

6 MR. HUTTON: I have not done
7 anything improper with any minutes.

8 MR. BECHTEL: Now you've got my
9 partner in there spending two days taking
10 notes and you're editing his notes.

11 MR. HUTTON: That was per the
12 Judge's Order.

13 MR. BECHTEL: You could have
14 handled that in a much more civilized way,
15 much more civilized and courteous way. You
16 could have.

17 I'm not talking about the judge,
18 I'm talking about you.

19 MR. HUTTON: There's no point in
20 arguing over it.

21 MR. BECHTEL: This will be Parker
22 Exhibit 6.

1 (Parker Deposition Exhibit No. 6
2 was marked for identification.)

3 EXAMINATION BY COUNSEL FOR ACC CONTINUED
4 BY MR. BECHTEL:

5 Q On another exercise, I was looking
6 for something and I found at page 3351 of the
7 transcript a reference to Partel, Inc, being
8 in business. This was a thing I had seen
9 before and I just couldn't remember where it
10 was.

11 This is on the date of
12 January 1988, so this is further intelligence
13 concerning what we were probing with.

14 A Yeah. If, I tried yesterday, if
15 it's all right with you, we'll supplement the
16 record and I will get you the date of
17 incorporation from the Secretary of the State
18 of when Partel came into existence because
19 frankly, I just don't remember. It is what
20 it is and I'll just call up and they'll give
21 me a certificate of when it was incorporated
22 and I'll send it to you.

1 Q That's no problem.

2 A

3 MR. BECHTEL: Exhibit 7, a trustee
4 proxy coupled with an interest.

5 (Parker Deposition Exhibit No. 7
6 was marked for identification.)

7 BY MR. BECHTEL:

8 Q I have two questions designed to
9 acquaint me with the efficacy of this proxy.

10 On the second page there is a
11 reference to the receipt of some wire
12 transfer of money as a condition to the
13 execution and delivery of the document and my
14 question is, did that occur?

15 A Yes.

16 Q The second question has to do on
17 the first page, second paragraph from the
18 bottom, the, as I'm reading this, and this is
19 not my field, but as I'm reading this, the
20 proxy continues until an indebtedness to
21 Partel, Inc, has been satisfied under a loan
22 agreement and stock pledge agreement bearing

Sup

Transcript of Proceedings

BEFORE THE
Federal Communications Commission

In the Matter of:

Docket No.: 86-173

AVALON, CALIFORNIA

RECEIVED

JAN 19 1988

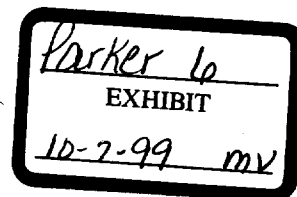
FCC
Office of the Secretary

DATE: January 7, 1988.

VOLUME: 18

PLACE: Washington, D.C.

PAGES: 3330 - 3437/3499



S K S Group, Ltd.

Official Reporter

1100 Eye Street, N.W.

Washington, D.C. 20006

202-720-0518

CROSS-EXAMINATION

BY MR. GASTFREUND:

Q Good morning, Mr. Parker. Could you just repeat for me once again your full name.

A Michael L. Parker.

Q And your full residence address once again, please.

A 22720 S.E. 410th Street, Enumclaw, that's E-N-U-M-C-L-A-W, Washington.

Q I just want to make sure I'm dealing with the right person. Your middle name is Leigh; is that correct?

A L-E-I-G-H, that is correct.

Q Okay. You were in attendance at the hearing sessions in these proceedings last March; were you not? You were in this hearing room; were you not?

A Yes, I was.

Q And isn't it true that you, when asked for your name, at that time, you provided a name other than Michael Parker?

MR. ROOT: Objection, Your Honor, relevance.

MR. GASTFREUND: I'd like to know, Your Honor, basically --

JUDGE LUTON: What do you mean asked for? Did he testify? When was he asked for his name, on the stand?

MR. GASTFREUND: No, Your Honor. No, but I'm

1 trying to find out if we're dealing with the same person,
2 frankly.

3 JUDGE LUTON: Well, I'm not going to try
4 matters outside of the hearing. I don't know what you mean
5 when you say, when you were asked for your name, you
6 provided -- you're trying something that is out there, not
7 in here, and it didn't occur here. Sustained.

8 MR. GASTFREUND: Well, I just wanted --

9 JUDGE LUTON: Sustained.

10 MR. GASTFREUND: -- to be sure that we're --

11 JUDGE LUTON: Sustained.

12 MR. GASTFREUND: -- dealing with the same
13 Michael Parker. Very well, Your Honor.

14 BY MR. GASTFREUND:

15 Q Mr. Parker, what's your background as a
16 consultant -- let me rephrase that.

17 How many years have you been a consultant in
18 the television industry?

19 A Let's see. I started in the television
20 business --

21 Q As a consultant.

22 A As a consultant. I suppose that depends on
23 your definition.

24 Q Consulting other people in connection with
25 preparation and prosecution of applications for television

1 stations.

2 A Well, when I started, I had an ownership
3 interest. If you count that, about seven years.

4 Q I see. You testified earlier in your -- I guess
5 it was yesterday, that Ms. Shaw was one of your first
6 independent clients. Do you recall that testimony?

7 A I do.

8 Q What do you mean by independent?

9 A I had no ownership interest or involvement
10 other than as a direct consulting basis.

11 Q Was Ms. Shaw, in fact, your such independent
12 consultant client?

13 A No.

14 Q And I believe you testified that -- I don't want
15 to characterize it.

16 It's true, isn't it, that Mr. Root referred
17 Ms. Shaw to you?

18 A Yes.

19 Q Did you ever have occasion to speak with her
20 prior to the time that Mr. Root referred her to you?

21 A No.

22 Q Have you ever had any conversations about
23 Channel 54 in Avalon with parties other than Mr. Root,
24 Ms. Shaw and equipment suppliers that are referenced in
25 your testimony and members at Partel, Inc.?

FMRN TRANSCRIPT

NATIONWIDE: 1-800-255-5040

CORBY GROUP N.J.: 1-800-822-0190

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MR. ROOT: Objection, relevance.

JUDGE LUTON: Ask the question again.

BY MR. GASTFREUND:

Q Other than the discussions you may have had with respect to the Channel 54 application of Ms. Shaw with members of your staff, and other than discussions that you may have had with Mr. Root and Ms. Shaw, have you discussed it with anyone else, the application of Ms. Shaw?

JUDGE LUTON: Overruled. Please answer.

THE WITNESS: As I testified earlier, with a number of Ms. Shaw's advisors, financial advisors, with regard to her stamps, stamp people, any number of people in that process.

BY MR. GASTFREUND:

Q Could you enumerate who those people were?

A Mr. Masry, who's here, her accountant.

Q That's Mr. Crane?

A That's correct.

Q Gary Crane?

A The people with the stamp company, both Wilshire Stamp Company and Mr. Kenadi.

Q Let me stop you for a second. When you say the people from the Wilshire Stamp Company, could you specifically enumerate who you're talking about?

A I believe Mr. Weyna. He was the president of

1 Wilshire Stamp Company. I remember that.

2 Q Who else?

3 A The equipment suppliers, Mr. Joe Shackelford.
 4 I attended a meeting with the county -- I don't recall the
 5 gentleman's name -- with regard to Black Jack that Ms. Shaw
 6 was in attendance at. I attended a party that Ms. Shaw was
 7 at where there were probably 50 or 60 of her friends, and
 8 she introduced me to all of the people and was talking about
 9 her television station.

10 Q Who is Mr. Kenadi that you've referenced?

11 A Mr. Peter Kenadi -- I believe it was Peter
 12 Kenadi -- was a stamp -- he was in the business of buying
 13 and selling stamps. I'm not sure what you call that
 14 position, but had been in it for a number of years and was
 15 the individual I remember that Ms. Shaw met Mr. Weyna
 16 through.

17 Q Do you have any knowledge as to whether
 18 Mr. Kenadi is employed by or works with Wilshire Stamp
 19 Company?

20 A No. The knowledge I have is the president of
 21 Wilshire Stamp Company used to work for Mr. Kenadi, and
 22 Mr. Kenadi was a much larger -- had a much larger company.

23 Q Do you know who Mr. Kenadi works for?

24 A I believe he worked for Mr. Kenadi. I under-
 25 stand Mr. Kenadi is now deceased.

FMNRN TRANSCRIPT
 NATIONWIDE 1 800 255 5040
 CORBY GROUP N.J. 1 800 822 0190

1 Q Do you know the company that he had worked for?

2 A His own. I believe I have a catalog of that
3 company at Mr. Root's office that I can get you the answer
4 to that today.

5 Q Now, in your discussions with Mr. Weyna, who
6 introduced you to Mr. Weyna?

7 A Christine Shaw.

8 Q And Ms. Shaw also introduced you to Mr. Kenadi
9 and Mr. Shackelford?

10 A That's correct. Well, I believe I had known
11 Mr. Shackelford prior to that.

12 Q How did you come to meet Mr. Shackelford?

13 A As I explained, I'm a consultant for Channel 38
14 in San Francisco, and I believe I met Mr. Shackelford --
15 had met him two or three weeks prior to that.

16 Q Prior to?

17 A Prior to meeting Ms. Shaw.

18 Q That was the first time you had met
19 Mr. Shackelford?

20 A Yes.

21 Q And did Mr. Shackelford have some relationship
22 with Channel 38 because you tied the two together, and I'm
23 not sure I understand the reference.

24 MR. ROOT: Objection, Your Honor. I haven't
25 objected up to now thinking this might go someplace

FMHN TRANSCRIPT

NATIONWIDE: 1-800-255-5040

CORBY GROUP NJ: 1-800-822-0190

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relevant, but I don't see how it's relevant to the testimony
of this witness.

JUDGE LUTON: Overruled.

THE WITNESS: Mr. Shackleford provided
engineering services to Channel 38.

BY MR. GASTFREUND:

Q Provided, meaning when? Can you put a time
frame on that?

A As far as I know, he still provides those
services to them.

Q Channel 38 in San Francisco, do you know the
call letters of that station?

A KWBB.

Q And the licensee, do you know that offhand?

A West Coast United Broadcasting.

Q So I can put the time frame in my mind
properly, as I understand your testimony, you first met
Mr. Shackleford in late 1985, or am I mistaken?

A No. I met Mr. Shackleford in early 1986.

Q I see. Now, you knew Mr. Root well before that
point; did you not?

A Oh, yes.

Q Mr. Root, in fact, served as your counsel in
another proceeding before the FCC; isn't that true?

A That is correct.

1 Q Did Mr. Root telephone you or call you or
2 communicate with you in any other way as to the fact that
3 Ms. Shaw was to be referred to you prior to the time that
4 Ms. Shaw contacted you?

5 A Yes, he did.

6 Q And what was the nature of that conversation?
7 What did he say to you?

8 A He said he had a client that needed some help
9 and that -- he explained briefly what was needed and that
10 she would be calling me.

11 Q Okay. Let's focus in on that help that she
12 needed. Did he explain to you why she needed your help and
13 why he could not provide such help?

14 MR. ROOT: Objection, relevance.

15 JUDGE LUTON: Overruled. Perfectly permissible
16 cross-examination.

17 THE WITNESS: I understood the application
18 process.

19 BY MR. GASTFREUND:

20 Q I'm sorry. I didn't hear you.

21 A I said I understood the application process.
22 He explained to me that he needed the financial projections
23 and needed to make sure that she was financially qualified
24 and that I could assist her in that.

25 Q That's all he said to you?

EXHIBIT 7

JACK J. CULLEN
HATCH & LESLIE
2700 Columbia Center
701 Fifth Avenue
Seattle, WA 9810
(206) 622-0090
Attorney for Petitioner

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

In re
Michael L. PARKER

Case No.: 89-01970

Debtor

Statement of Financial
Affairs for a Debtor Not
Engaged in Business

Social Security No.: 539-44-9469
and Debtor's Employer's Tax
Identification No.: NONE

Chapter 7

1. NAME AND RESIDENCE.

a. What is your full name?

M.L. PARKER

b. Have you used, or been known by, any other names within the six years immediately preceding the filing of the original petition herein?

c. Where do you now reside?

22720 S.E. 410TH
ENUMCLAW, WA 98022

d. Where else have you resided during the six years immediately preceding the filing of the original petition herein?

4041 Ruston Way
Tacoma, WA 98402

2. OCCUPATION AND INCOME.

a. What is your occupation?

Consultant

b. Where are you now employed?

Self-employed

Time:

c. Have you been in a partnership with anyone, or engaged in any business during the six years immediately preceding the filing of the original petition herein?

Mt. Tahoma Stables

Limited Partnership

Dates: from to

Circumstances:

Sunset Partnership

Dates: from 1-83 to 5-86

Circumstances:

Thunder Falls Waterslide
Limited Partnership

Dates: from to

Circumstances:

d. What amount of income have you received from your trade or profession during each of the two calendar years immediately preceding the filing of the original petition herein?

1987--\$93,554

1988--\$45,000 (est.)

e. What amount of income have you received from other sources during each of these two years?

1987--\$7,361 (sale of stock)

1988--0

3. TAX RETURNS AND REFUNDS.

a. Where did you file your federal, state, and municipal income tax returns for the two years immediately preceding the filing of the original petition herein?

Ogden, UT

b. What tax refunds [income and other] have you received during the year immediately preceding the filing of the original petition herein?
none

c. To what tax refunds (income or other), if any, are you, or may you be, entitled?
none

4. FINANCIAL ACCOUNTS, CERTIFICATES OF DEPOSIT, AND SAFE DEPOSIT BOXES.

a. What accounts or certificates of deposit or shares in banks, savings and loan, thrift, building and loan and homestead associations, credit unions, brokerage houses, pension funds and the like have you maintained, alone or together with any other person, and in your own or any other name, within the two years immediately preceding the filing of the original petition herein?

Institution: FIBW - Westgate Tacoma
Checking

②